

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

**PLAINTIFFS' JOINT MOTION FOR EXPEDITED BRIEFING SCHEDULE,
HEARING DATE, AND DECISION ON MOTIONS FOR PRELIMINARY
INJUNCTION**

Pursuant to Local Rule 7.3(f), the Williams Plaintiffs and the NAACP Plaintiffs (collectively, “Plaintiffs”) respectfully move the Court to expedite the briefing schedule, hearing, and decision on the NAACP Plaintiffs’ Motion for Preliminary Injunction (Doc. 182) and the Williams Plaintiffs’ Motion for Preliminary Injunction (forthcoming) (together, the “PI Motions”).

Plaintiffs request that the Court adopt the expedited schedule as set forth below and in the accompanying memorandum, which would allow a decision on or before December 1, 2025—minimizing disruption to the primary schedule announced by the State Board of Elections and consistent with the Court’s October 30, 2025 Order expressing its intent to resolve all claims expeditiously. Doc. 179.

Event	Deadline
PI Motions	October 31, 2025
Briefs in Response to PI Motions	November 14, 2025
Reply Briefs	November 18, 2025 at 10:00 a.m.
Preliminary Injunction Hearing	November 19, 2025, or as soon as the Court can accommodate

Alternatively, Plaintiffs submit that the Court has authority to adjust the start of the candidate filing period, currently set to begin on December 1, 2025, to allow additional time to resolve the PI Motions. *See, e.g., South Carolina v. United States*, 585 F. Supp. 418 (D.D.C. 1984); *Larios v. Cox*, 305 F. Supp. 2d 1335, 1342–44 (N.D. Ga. 2004). Should the Court choose to exercise that authority, Plaintiffs propose the following adjusted schedule:

Event	Deadline
PI Motions	October 31, 2025
Briefs in Response to PI Motions	November 17, 2025
Reply Briefs	November 24, 2025
Preliminary Injunction Hearing	During the week of December 1, 2025

Plaintiffs conferred with Legislative Defendants and the State Board of Elections (“SBOE”) on October 30 and 31, 2025. Legislative Defendants indicated they will state their position in their forthcoming filing responding to the Court’s October 30, 2025 Order. The SBOE did not state a position regarding Plaintiffs’ request and will assess the feasibility of adjusting the start of the candidate filing period.

WHEREFORE, Plaintiffs respectfully request that the Court:

1. Grant this Motion to Expedite;
2. Adopt the expedited briefing schedule proposed in Plaintiffs’ accompanying memorandum; and
3. Grant such other and further relief as the Court deems just and proper.

Dated: October 31, 2025

Respectfully Submitted,

/s/ Lalitha D. Madduri

/s/ Hilary Harris Klein

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** Special Appearance pursuant to
Local Rule 83.1(d)*

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**Appearing in this matter by Special
Appearance pursuant to L-R 83.1(d)*

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***Applications to appear specially
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CERTIFICATE OF SERVICE

I certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Olivia Molodanof
Olivia Molodanof